# EXHIBIT 6

#### IN THE UNITED STATES DISTRICT COURT

#### EASTERN DISTRICT OF NORTH CAROLINA

#### WESTERN DIVISION

JASON WILLIAMS,

Plaintiff,

**ORIGINAL** 

vs.

Case No. 5:19-cv-00475-BO

AT&T MOBILITY, LLC,

Defendant.

\*\*HIGHLY CONFIDENTIAL\*\*
DEPOSITION OF ROBERT ARNO
30(b)(6)

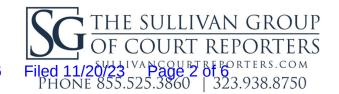
February 28, 2022

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12:03 p.m. to 4:27 p.m. EST

REMOTELY REPORTED VIA VIDEO CONFERENCING

REPORTED BY: Tamara L. Houston CA CSR No. 7244, RPR, CCRR No. 140 FILE NO. 22-108895



	1	MS. STAGG: Thank you.
	2	THE VIDEOGRAPHER: Okay. We are going off
	3	the record at 4:08 p.m. Eastern time.
	4	(Recess: 4:08 p.m. to 4:19 p.m.)
16:18:52	5	THE VIDEOGRAPHER: Okay. We are back on
	6	the record at 4:19 p.m. Eastern time.
	7	You may proceed.
	8	MR. GALLO: Thank you.
	9	BY MR. GALLO:
16:19:01	10	Q. Mr. Arno, you testified earlier that you
	11	have reviewed Mr. Williams' account notes, but you
	12	didn't review the printed out version we were showing
	13	you in this deposition; is that correct?
	14	A. Correct.
16:19:19	15	Q. And I think you testified that you reviewed
	16	a different version or a version of the account
	17	notes that's viewable on AT&T's system; is that
	18	correct?
	19	A. Correct.
16:19:32	20	Q. Is is that are those notes viewable
	21	through a particular program or system? Does it have
	22	any sort of name?
	23	A. It's notations in Telegence.
	24	Q. Notations in Telegence.
16:19:47	25	A. Correct.

	1	Q. And using that program or is that a
	2	program on your work computer?
	3	A. Yes.
	4	Q. And using that program, you're able to view
16:20:00	5	customer account notes, correct?
	6	A. Correct.
	7	Q. Do you see any sort of radio buttons or
	8	special indicators on customer account notes through
	9	that system?
16:20:23	10	A. You mean there's a special instructions
	11	indicator.
	12	Q. Okay. Is there a special instructions
	13	indicator in if there are special instructions on
	14	a customer account, do you have any sort of indicator
16:20:37	15	that those special instructions are on the account
	16	when you view them through the notations in Telegence
	17	system?
	18	A. You'd have to kind of deduce which special
	19	instructions were on the account on a specific date
16:20:55	20	and time. As I mentioned before
	21	Q. Okay.
	22	A the radio button just alerts the user
	23	there are special instructions, but it only has the
	24	last set of special instructions. So if I wanted to
16:21:10	25	see what special instructions were on the account,

	1	let's say, on November 15th, 2020, I'd have to
	2	actually go back in time in the notes and do it
	3	manually.
	4	Q. Okay. I understand that.
6:21:24	5	For the current, sort of most recent note,
	6	does that have any sort of indicator that you can see
	7	without searching for it?
	8	A. It has a black radio button that indicates
	9	there are special instructions on the account.
6:21:40	10	Q. Okay. So I think you testified that
	11	that to your knowledge, that black radio button
	12	appears in Telegence and that a similar or the
	13	same black radio button also appears when you look at
	14	account notes in the notations in Telegence system
6:21:56	15	that you're talking about right now?
	16	MS. STAGG: Objection. Misstates his
	17	testimony.
	18	BY MR. GALLO:
	19	Q. Is that correct?
6:22:06	20	A. My understanding is in the other system
	21	that's customer-facing, OPUS, you can also use
	22	special instructions. I don't know how it's
	23	displayed.
	24	Q. Okay. I guess I'm a little confused, then.
6:22:21	25	So let's leave OPUS to one side.

	1	I think were you testifying earlier about
	2	something called Telegence as a way to view account
	3	notes and that is distinct from OPUS; is that
	4	correct? Am I remembering that correctly?
16:22:42	5	A. So OPUS feeds into Telegence, so I can see
	6	what's being done in OPUS by reviewing notes in
	7	Telegence. I don't know if that answers your
	8	question correctly or not.
	9	Q. I think maybe I'm just I didn't
16:22:58	10	understand your previous testimony. So the when
	11	you're looking at the notes through the program you
	12	just referenced, notations in Telegence, you are
	13	looking at the notes in Telegence?
	14	A. Correct.
16:23:14	15	Q. Okay. Now I understand.
	16	So as a result, the black radio button that
	17	you were describing earlier that corresponds to the
	18	most recent special instructions appears in when
	19	you view it through notations in Telegence?
16:23:31	20	A. Correct.
	21	MR. GALLO: All right. At this time, I am
	22	finished with my questions. I'm happy to end the
	23	deposition and reserve any additional time. I don't
	24	know if you want to do any redirect, Ms. Stagg.
16:23:46	25	MS. STAGG: Nope. No, we're good.